

MENKEN SIMPSON & ROZGER LLP

80 PINE STREET, 33RD FLOOR
NEW YORK, NEW YORK 10005

TELEPHONE: (212) 509-1616

FACSIMILE: (212) 509-8088

WWW.NYEMPLOYEEELAW.COM

SO ORDERED:

Date 2/17/2022 Richard M. Berman
Richard M. Berman, U.S.D.J.

BRUCE E. MENKEN
SCOTT SIMPSON
JASON J. ROZGER ^Δ
BRENN A RABINOWITZ
RAYA F. SAKSOUK

^Δ ALSO ADMITTED NJ

ALAN SERRINS
OF COUNSEL

February 16, 2022

BY ECF

Hon. Richard M. Berman, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Grottano, et al. v. City of New York, et al., 15-CV-9242 (RMB) (KNF)

Your Honor:

This firm is co-counsel for Plaintiffs in the above-captioned case. In accordance with Your Honor's Individual Rules of Practice, Sec. 4(A), I write to respectfully request that all exhibits to Plaintiff's forthcoming letter-motion on behalf of minor and incapacitated class members be filed under seal, with access only to selected parties. These exhibits will consist of class members' Supplemental Information and Certification Forms ("SIF"), which contain their contact information (and/or that of their parents) alongside intimate details about their invasive searches. For parents and children who are victims of domestic violence, as in the case of at least one minor class member's mother, these details are all the more sensitive.

The City has advised Plaintiffs' counsel that it has no objection to the filing of these documents under seal. We thank the Court for its consideration of this request.

Respectfully submitted,

s/ Raya F. Saksouk